REMARKS

Claims 1-6, 8-11, 23-29 and 32-36 are rejected under 35 U.S.C. § 103(a) as being unpatentable over CTRC (reference V on PTO-892 mailed 31 August 2007), hereinafter "CTRC" in view of Taylor (see PTO-892, mailed 22 August 2006 and 31 August 2007 and 14 November 2007), hereinafter "Taylor", and Coulouris (see PTO-892 mailed November 14, 2007), hereinafter "Coulouris", and Marcos et al (U.S. Patent No. 6,347,342), hereinafter "Marcos". Claims 23-29 are rejected as being unpatentable over CTRC in view of Taylor, Coulouris, Marcos and Sun et al (U.S. Patent No. 6,442, 663), hereinafter "Sun". Claim 7 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over CTRC in view of Taylor, Coulouris and Marcos as applied to claim 1 above, and further in view of Lymer et al. (U.S. Patent No 6,230, 117 B1), hereinafter "Lymer". Claims 14-20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Marcos, in view of CTRC, Taylor and Coulouris. Applicants submit that no new matter was introduced in the amendment to the claims. Claims 1-11, 14-20, 23-29 and 32-36 are pending. Claim 32 has been amended and claims 33 and 34 have been cancelled. No new matter has been introduced in this response.

Claim Rejections Under 35 U.S.C. § 103(a)

Claims 1-6, 8-11, 23-29 and 32-36 are rejected under 35 U.S.C. § 103(a) as being unpatentable over CTRC in view of Taylor, Coulouris, and Marcos. Claims 23-29 are rejected as being unpatentable over CTRC in view of Taylor, Coulouris, Marcos and Sun. Claim 7 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over CTRC in view of Taylor, Coulouris and Marcos as applied to claim 1 above, and further in view of Lymer. Claims 14-20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Marcos, in view of CTRC, Taylor and Coulouris.

Applicants respectfully traverse the rejection of claims 1-6, 8-11, 23-29, 32 and 35-36. In paragraph 9 found in page 5 of the office action it was stated that the Marcos reference at col. 4, lines 1-45 teaches the claim limitation found in independent claims 1, 23 and 32 of:

"the HIP system further including a first object to read conversion information from a file that explains how to translate data types from the first system to the second

system to a particular flow control and a second object to access end-to-end mapping information from the file to a particular flow control"

Marcos at col. 4, lines 1-45 fails to teach or suggest flow control as currently recited. For example, there is no mention of "mapping information from the file to a particular flow control". As mention in paragraph [0054] of the present application the IAdmin object 662 is used to access end-to-end mapping information such as a particular .TIM file to a particular flow control and the IReadlib object 64 is used to read the metadata within the file. Marcos also does not discuss the use of first and second objects acting on a file as recited. Marcos discusses several objects such as the client object, proxy object, server object, and stub object, but none of these objects act in concert with another object to perform the tasks recited above. For example, Marcos mentions translating a client object message into the message protocol of the server object's object model. The proxy object translates a method identification in the client object's message to one expected by the server object (see col. 4, 29-30). Marcos also mentions forwarding the translated message to the server object via the proxy and stub objects mapped to the server object by a mediating component, then forwarding the message to the server object via the proxy and stub objects. The server object then processes the message and the response is sent back to the client object via the stub and proxy objects with the proxy object translating the response such that the response is of the type expected by the client object.

In Marcos there is no "reading of conversion information from a file" by an object as recited nor the accessing of end-to-end mapping info from the file to a particular flow control as recited. As such, it is believed that claims 1-11, 14-20, 23-29, 32 and 35-36 are in condition for allowance in view of the cited references.

With specific regard to claims 23-29 it was mentioned in the office action at paragraph 25, page 10 that the Sun reference teaches the claim limitation of:

"the HIP system further including first and second conversion components, the first conversion component handling conversion issues related to aggregate data types and the second conversion component handling conversions issues related to primitive data types".

The Sun reference at paragraph 25 discusses an XDR routine that translates primitive data values into machine independent format and an MSRM library routine that translates

complex data structures (e.g., user-defined types and pointers) into a stream of machine-independent migration information. As mentioned in paragraph [0050] of the present application, aggregate data types are, for example, the way elements in a matrix are organized in different systems, etc. The complex data structures handled by the MSRM library routine in Sun are not the same as the aggregate data types handled by the first conversion component in claim 23. Furthermore, the Marco reference at col. 4, lines 1-45 makes no mention or suggestion of a .TIM file as recited. As noted in paragraph [0054] the .TIM file is part of the data store 676. As such, claims 23-29 are believed to be in condition for allowance in view of the cited references.

Independent claim 32 has been amended to include the limitation mentioned above: *"the HIP system further including first and second conversion components, the first conversion component handling conversion issues related to aggregate data types and the second conversion component handling conversions issues related to primitive data types"*. As previously mentioned, the complex data structures handled by the MSRM library routine in Sun are not the same as the aggregate data types handled by the first conversion component in claim 32. Furthermore, the Marco reference at col. 4, lines 1-45 makes no mention or suggestion of a .TIM file as recited. Independent claim 32 has been further amended to include the limitations previously found in both claims 33 and 34 as well as: *"listening for a connection from the first system; receiving information related to the first call in response to the connection, wherein the first call comprises data in a first form; and converting the data from the first form into a second form usable by the second software object."* As amended, independent claim 32 and claims 35-36 are believed to be in condition for allowance.

CONCLUSION

In view of the above amendments and remarks, Applicants respectfully submit that the present application is in condition for allowance. Reconsideration of the application is respectfully requested.

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